

EXHIBIT 3

Marie Jonas

From: Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>
Sent: Friday, August 20, 2021 3:28 PM
To: Jiyun Cameron Lee; Amanda Chan; Marie Jonas
Cc: Michael Ram x20021; Marie Appel x20020; Christina Romero; Chantal Khalil
Subject: RE: Lowell v. Lyft - Depositions

Counsel,

In connection with the over 2,500 pages of privilege logs Lyft produced earlier this summer, please promptly provide the subject matter for the logged entries, as well as a list of all attorneys and other non-apparent relationships among authors and recipients as is required under Local Rule 26.2(A)(2)(a).

Thanks,

Jeremiah

Jeremiah Frei-Pearson
FINKELSTEIN, BLANKINSHIP, FREI-PEARSON & GARBER, LLP
One North Broadway, Suite 900
White Plains, NY 10601
Tel: 914-298-3284 | Fax: 914-908-6722

From: Jiyun Cameron Lee <jlee@folgerlevin.com>
Sent: Saturday, August 14, 2021 11:31 AM
To: Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>; Amanda Chan <AChan@FBFGLaw.com>; Marie Jonas <mjonas@folgerlevin.com>
Cc: Michael Ram x20021 <MRam@forthepeople.com>; Marie Appel x20020 <MA Appel@forthepeople.com>; Christina Romero <christinaromero@forthepeople.com>; Chantal Khalil <ckhalil@fbfglaw.com>
Subject: RE: Lowell v. Lyft - Depositions

Jeremiah,

To confirm, 9 a.m. PT/noon ET on **Thursday, August 19** is the planned meet and confer session.

And to be clear, regardless of how Magistrate Judge Krause rules on the issue, Ms. Chan would not be the designee on Autonomous Vehicles, Scooters, and Bikes. Those are entirely separate lines of business from consumer **rideshare**, which is the subject of this lawsuit that has now been on file for four years. As you are no doubt aware from having reviewed her deposition transcript in the *ILRC* case and having listened in on her trial testimony in that case, Ms. Chan has a broad range of responsibilities within the rideshare organization, including overseeing WAV, but has no responsibilities whatsoever as to Autonomous Vehicles, Scooters, and Bikes.

Best,
Jiyun

From: Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>
Sent: Saturday, August 14, 2021 7:27 AM
To: Jiyun Cameron Lee <jlee@folgerlevin.com>; Amanda Chan <AChan@FBFGLaw.com>; Marie Jonas <mjonas@folgerlevin.com>

Cc: Michael Ram x20021 <MRam@forthepeople.com>; Marie Appel x20020 <MAppel@forthepeople.com>; Christina Romero <christinaromero@forthepeople.com>; Chantal Khalil <ckhalil@fbfglaw.com>

Subject: RE: Lowell v. Lyft - Depositions

And yes, 9:00 Pacific/ noon EST should work to confer about the other topics. Thanks.

From: Jeremiah Frei-Pearson

Sent: Saturday, August 14, 2021 10:25 AM

To: Jiyun Cameron Lee <jlee@folgerlevin.com>; Amanda Chan <ACHan@FBFGLaw.com>; Marie Jonas <mjonas@folgerlevin.com>

Cc: Michael Ram x20021 <MRam@forthepeople.com>; Marie Appel x20020 <MAppel@forthepeople.com>; Christina Romero <christinaromero@forthepeople.com>; Chantal Khalil <ckhalil@fbfglaw.com>

Subject: RE: Lowell v. Lyft - Depositions

Thank you Jiyun. We intend to write the Court a letter on this dispute tomorrow. Given that Ms. Chan's deposition is set for Wednesday, we ask that Lyft respond by end of day on Monday, so that the Court has an opportunity to rule before the deposition if Judge Krause's schedule permits.

Best,

Jeremiah

From: Jiyun Cameron Lee <jlee@folgerlevin.com>

Sent: Friday, August 13, 2021 4:47 PM

To: Amanda Chan <ACHan@FBFGLaw.com>; Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>; Marie Jonas <mjonas@folgerlevin.com>

Cc: Michael Ram x20021 <MRam@forthepeople.com>; Marie Appel x20020 <MAppel@forthepeople.com>; Christina Romero <christinaromero@forthepeople.com>; Chantal Khalil <ckhalil@fbfglaw.com>

Subject: RE: Lowell v. Lyft - Depositions

Jeremiah –

I write to confirm that as to Topic No. 7, Ms. Chan will testify on the manner by which Lyft assesses the profitability of non-WAV-related programs, pilots, and initiatives for which Ms. Chan is involved, and of Lyft Lux and XL.

As to Autonomous Vehicles (AVs), Scooters, and Bikes, Lyft will not designate Ms. Chan or any other witness.

Let's set a time to meet and confer on Topic Nos. 8, 24, 26 and 27, and other subjects. Please let me know if 9 a.m. PT/noon ET on Thursday, August 19, works for you.

Best,

Jiyun

From: Amanda Chan <ACHan@FBFGLaw.com>

Sent: Thursday, August 12, 2021 11:23 AM

To: Jiyun Cameron Lee <jlee@folgerlevin.com>; Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>; Marie Jonas <mjonas@folgerlevin.com>

Cc: Michael Ram x20021 <MRam@forthepeople.com>; Marie Appel x20020 <MAppel@forthepeople.com>; Christina Romero <christinaromero@forthepeople.com>; Chantal Khalil <ckhalil@fbfglaw.com>

Subject: RE: Lowell v. Lyft - Depositions

Greetings,

Please join this meeting at 5pm ET today.

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Best,

Amanda Chan

Associate Attorney

Direct No/Fax: (914) 824-1560 (ext. 41560)

FINKELSTEIN, BLANKINSHIP,

FREI-PEARSON & GARBER, LLP

One North Broadway, Suite 900

White Plains, NY 10601

From: Jiyun Cameron Lee <jlee@folgerlevin.com>

Sent: Thursday, August 12, 2021 2:06 PM

To: Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>; Marie Jonas <mjonas@folgerlevin.com>

Cc: Michael Ram x20021 <MRam@forthepeople.com>; Marie Appel x20020 <MAppel@forthepeople.com>; Christina Romero <christinaromero@forthepeople.com>; Amanda Chan <ACHan@FBFGLaw.com>; Chantal Khalil <ckhalil@fbfglaw.com>

Subject: RE: Lowell v. Lyft - Depositions

Jeremiah,

We are not producing an additional witness on Topic No. 7. I'll talk to you at 2:00 pm Pacific time. Let me know what number to call.

Best,

Jiyun

From: Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>

Sent: Thursday, August 12, 2021 10:06 AM

To: Jiyun Cameron Lee <jlee@folgerlevin.com>; Marie Jonas <mjonas@folgerlevin.com>

Cc: Michael Ram x20021 <MRam@forthepeople.com>; Marie Appel x20020 <MAppel@forthepeople.com>; Christina Romero <christinaromero@forthepeople.com>; Amanda Chan <ACHan@FBFGLaw.com>; Chantal Khalil

<ckhalil@fbfglaw.com>

Subject: RE: Lowell v. Lyft - Depositions

Thank you Jiyun. Given that Ms. Chan is set to testify next week, the most urgent issue is the representation in Topic No. 7 that Ms. Chan's testimony will be limited to only those programs, pilots, and initiatives for which she was responsible. Will Lyft be producing an additional witness who can testify without that limitation? If the answer is yes, then there is less urgency to confer. If the answer is no, then let's confer today at 2:00 Pacific.

We are also troubled by the new blanket objections to Topic Nos. 8, 24, 26, and 27 and need to confer about those topics as well.

Best,

Jeremiah

Jeremiah Frei-Pearson
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White Plains, NY 10601
Tel: 914-298-3284 | Fax: 914-908-6722

From: Jiyun Cameron Lee <jlee@folgerlevin.com>

Sent: Thursday, August 12, 2021 12:13 PM

To: Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>; Marie Jonas <mjonas@folgerlevin.com>

Cc: Michael Ram x20021 <MRam@forthepeople.com>; Marie Appel x20020 <MAappel@forthepeople.com>; Christina Romero <christinaromero@forthepeople.com>; Amanda Chan <ACHan@FBFGLaw.com>; Chantal Khalil <ckhalil@fbfglaw.com>

Subject: RE: Lowell v. Lyft - Depositions

Jeremiah,

Marie is not available today and tomorrow, so I am responding on her behalf. We are available to speak with you on Monday at the same time you proposed, at 11:30 am Pacific.

One question I have for you is what you mean by "if Lyft intends to stand on these objections," as the topics on which we've identified Ms. Chan make clear that she will be offering responsive testimony. As you will recall, Marie stated in her email dated June 14, 2021:

We have preliminarily identified the following witnesses from Lyft who will testify on the PMK topics you circulated (subject to certain objections). We reserve the right to supplement or modify this list, including the specific topics to be handled by each witness. In addition, please be advised that, based on the overbreadth of your topics, individuals identified may not address the entire subject matter.

Marie then identified Ms. Chan as Lyft's designee on certain topics, including all the topics we ultimately identified for her in Lyft's objections and responses to Plaintiffs' amended 30(b)(6) deposition notice. (One difference is that we are no longer offering Ms. Chan on Topic 5.)

If the matter cannot wait until Monday, then I can speak with you today regarding Ms. Chan's topics at 2:00 pm Pacific, or tomorrow, Friday, at 1:30 pm Pacific. Please let me know if either of these times works for you.

Best,

Jiyun

From: Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>

Sent: Thursday, August 12, 2021 5:26 AM

To: Marie Jonas <mjonas@folgerlevin.com>

Cc: Jiyun Cameron Lee <jlee@folgerlevin.com>; Michael Ram x20021 <MRam@forthepeople.com>; Marie Appel x20020 <MA Appel@forthepeople.com>; Christina Romero <christinaromero@forthepeople.com>; Amanda Chan <ACHan@FBFGLaw.com>; Chantal Khalil <ckhalil@fbfglaw.com>

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Good morning Marie—

As you know, we served the 30(b)(6) notice four months ago, repeatedly offered to confer, and did, in fact, confer about the noticed topics. During those conferrals, Lyft did not voice the objections that you provided last Friday – less than two weeks before the depositions. Needless to say, we were surprised to receive these objections on Friday, and the objections are not well-taken.

We are, of course, willing to confer again. Are you available today at 2:30 EST/11:30 Pacific to confer? If not, please suggest alternative dates and times.

Please be advised that if Lyft intends to stand on these objections then we will need to hold Ms. Chan's deposition open or seek the Court's assistance prior to Ms. Chan's deposition, so we need to confer as soon as possible. Thanks and we look forward to speaking with you.

Best,

Jeremiah

Jeremiah Frei-Pearson

Sent from my iPhone

On Aug 5, 2021, at 7:28 PM, Marie Jonas <mjonas@folgerlevin.com> wrote:

Good afternoon, Jeremiah,

Attached please find Lyft's objections and responses to Plaintiffs' amended 30(b)(6) deposition notice.

In addition, we wanted to advise you that we will accept service of Mr. Wu's deposition subpoena. He is available for a deposition the week of September 13.

With regard to Ms. Mims, we have not been able to contact her and thus cannot accept service on her behalf.

Kindly,

Marie

Folger Levin LLP

Marie Elizabeth Jonas

Pronouns: She/Her

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